

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR
PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO
RICO, et al.,

Debtor

PROMESA Title III

No. 17 BK 3283-LTS
(Jointly Administered)

IN RE:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR
PUERTO RICO,

as representative of

PUERTO RICO ELECTRIC POWER
AUTHORITY

Debtor.

PROMESA Title III

No. 17 BK 4780-LTS
(Jointly Administered)

**MOTION FOR LEAVE TO FILE THE ENVIRONMENTAL GROUPS' OBJECTION
TO THE MODIFIED SECOND AMENDED TITLE III PLAN OF ADJUSTMENT
OF THE DEBT OF THE PUERTO RICO ELECTRIC POWER AUTHORITY**

COME NOW, Comité Diálogo Ambiental, Inc., El Puente de Williamsburg, Inc., Enlace Latino de Acción Climática (ELAC), Comité Yabucoeño Pro-Calidad de Vida, Inc. (YUCAE), Alianza Comunitaria Ambientalista del Sureste, Inc. (ACASE),

Sierra Club Inc. and its Puerto Rico chapter, Mayagüezanos por la Salud y el Ambiente, Inc., Coalición de Organizaciones Anti Incineración, Inc., Amigos del Río Guaynabo, Inc., (collectively, “Environmental Groups”), as parties in interest, by and through the undersigned counsel, respectfully alleges and prays:

1. On June 12, 2023, the undersigned counsel completed its motion objecting to the confirmation of the Plan (*Objection by the Environmental Groups to the Modified Second Amended Title III Plan of Adjustment of the Debt of the Puerto Rico Electric Power Authority*) and attempted to submit it via the Court’s CM/ECF system to Dockets 3:17-BK-3283-LTS and 3:17-BK-4780-LTS. The filing was timely and successful in Docket 3:17-BK-3283-LTS ([ECF No. 24542](#)), but not in Docket 3:17-BK-4780-LTS.
2. On June 13, 2023, the undersigned counsel made attempts to contact the Clerk of the Court to resolve the issue and engaged in a good-faith effort to diligently file the Plan Objection in Docket 3:17-BK-4780-LTS. That filing was successful at 10am on June 13th ([ECF No. 3718](#)).
3. Having now resolved the mishap which prevented the submission via CM/ECF, we respectfully request that this Honorable Court grant leave to file the Objection in Docket 3:17-BK-4780-LTS, and/or allow the Objection filed there on June 13th to stand.

WHEREFORE, it is respectfully requested from this Honorable Court to take notice of the above for all relevant purposes.

I HEREBY CERTIFY that, on this same date, I filed this document electronically with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all parties of record and CM/ECF participants in this case.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 14th day of June 2023.

/s/William Santiago-Sastre

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